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paid by KIU's water service customers instead of to the St. John's Fire District. KIU moved to dismiss Walz's original complaint arguing, among other things, that it must be decided in the context of a general rate case.³ KIU has since brought a rate case and KIU submits Walz's complaint should be considered in the pending rate case docket⁴ rather than as an individual complaint.

The gravamen of Walz's Complaint is that KIU's customers, instead of the St. John's Fire Department, should bear the cost of providing hydrant service. This is an issue of rate design. Assuming for the sake of argument that Walz were to prevail, the lost revenue from the Hydrant Charges, which is significant, would have to be absorbed by other customers, and require an increase in their rates. This sort of redistribution can only be achieved in a rate case, not in the confines of a consumer complaint. The Commission has dismissed analogous complaints, explaining: "this [requested] change would result in increases in monthly bills to some customers and decreases in monthly bills for others, such a revision would affect all of [the company's] rate payers and could, therefore, only be addressed in a general rate making proceeding."⁵

KIU submits the interests of judicial economy would be served by substantive consolidation of this Complaint with the pending rate case. KIU suggests the Commission treat Walz's Complaint as a petition to intervene in the rate case and would not oppose granting intervention. With intervention granted, Walz could be placed on the same schedule for prefiled testimony and participate in the hearing in the same manner as other intervenors.

³ See KIU Motion to Dismiss and Suspend Schedule, filed July 23, 2019.

⁴ See Application of Kiawah Island Utility, Incorporated for Adjustment of Rates and Charges and Modifications to Certain Terms and Conditions for the Provision of Water and Sewer Service, Docket No. 2018-257-WS.

⁵ Order 2010-111, Dockets 2009-39-W 2009-75-WS, 2009-101-W, 2009-102-W.

For the foregoing reasons, KIU respectfully requests the Commission grant the following relief:

1. Suspend all deadlines for pleading and prefilings testimony in this docket until this motion is fully considered and ruled upon.
2. Accept and grant Walz's Complaint as a Petition for Intervention in Docket No. 2018-257-WS granting Walz the same right to participate in that docket as any other intervenor.
3. Close the above captioned Complaint docket upon granting consolidation and intervention.

Respectfully submitted,

Date: December 21, 2018

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-212-WS
CERTIFICATE OF SERVICE

I, **Carl E. Bell**, hereby certify that I have, on this **21st day of December 2018**, served the ***MOTION TO CONSOLIDATE AND SUSPEND FILING DEADLINES***, upon the parties listed below by email to the following person(s) listed below:

Colleen Walz , Chief
c.walz@stjfd.org
St. Johns Fire District
Post Office Box 56
Johns Island, SC 29457

Jeffrey M. Nelson, Esquire
jnelson@regstaff.sc.gov
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201



Carl E. Bell, Paralegal
Terreni Law Firm, LLC
1508 Lady Street
Columbia, South Carolina 29201
Telephone (803) 771-7228
Fax (803) 771-8778
carlbell@terrenilaw.com

December 21, 2018
Columbia, South Carolina